Message

From: Lamson, Amy [Lamson.Amy@epa.gov]

Sent: 7/19/2018 4:50:45 PM

To: Farrar, Wanda [farrar.wanda@epa.gov]; Bartlett, Keith [Bartlett.Keith@epa.gov]

CC: Ayres, Sara [Ayres.Sara@epa.gov]; Dykes, Teresa [Dykes.Teresa@epa.gov]; Muellerleile, Caryn

[Muellerleile.Caryn@epa.gov]; Adams, Darryl [Adams.Darryl@epa.gov]

Subject: RE: Re-proposal of OAR SAN 4908 – NESHAP Amendment: General Provisions for Once In Always In

I agree that schedule alone is not an adequate rationale for a tier. I can discuss this with my management regarding whether a tier change is appropriate, but it would be helpful to know whether other offices are recommending a tier change.

Amy Lamson Regulatory Management Division, Acting Director OA/OP/ORPM U.S. EPA 202-564-3949

From: Farrar, Wanda

Sent: Thursday, July 19, 2018 12:46 PM **To:** Bartlett, Keith < Bartlett.Keith@epa.gov>

Cc: Ayres, Sara <Ayres.Sara@epa.gov>; Dykes, Teresa <Dykes.Teresa@epa.gov>; Lamson, Amy <Lamson.Amy@epa.gov>;

Muellerleile, Caryn < Muellerleile. Caryn@epa.gov>; Adams, Darryl < Adams. Darryl@epa.gov>

Subject: RE: Re-proposal of OAR SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In

Good Afternoon Keith,

Does your management want this action re-tiered? I am unaware of any ADP requirements to do so. (OP, please "chime in" if there is.) If tier level is a concern, a tier change request is an option. We have no problem adding interested offices to this workgroup. Please let me know if your office has a request that should be presented to our management.

Many thanks, Wanda

From the desk of: Wanda Farrar

From: Bartlett, Keith

Sent: Thursday, July 19, 2018 11:01 AM
To: Farrar, Wanda <farrar.wanda@epa.gov>

Cc: Ayres, Sara <<u>Ayres.Sara@epa.gov</u>>; Dykes, Teresa <<u>Dykes.Teresa@epa.gov</u>>

Subject: RE: Re-proposal of OAR SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In

Wanda, thank you for this information.

I don't understand the rationale for both not re-tiering a rule from 2007, and for keeping a rule a Tier 3 so that it can proceed on a certain predetermined schedule. Whose schedule? The Rule itself should dictate the Tier, regardless of the need to get a rule out the door on some predetermined schedule.

Will OAR answer that question?

I am happy to discuss -

Keith

From: Farrar, Wanda

Sent: Thursday, July 19, 2018 10:39 AM **To:** RSC Core < RSC Core@epa.gov>

Subject: Re-proposal of OAR SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In

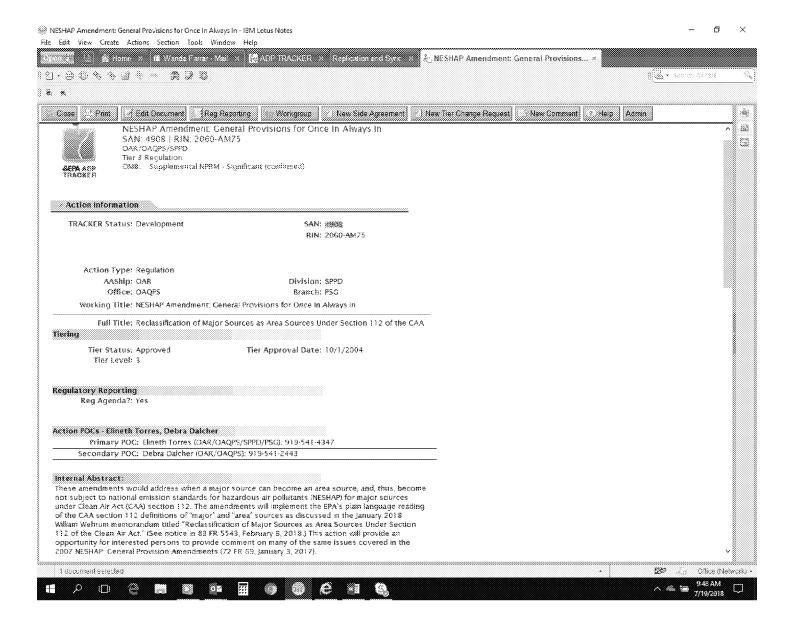
Good Day RSC,

OAR has received questions re: SAN 4908 – NESHAP Amendment: General Provisions for Once In Always In. This is a re-proposal of the 2007 proposal. OAR staff has been working w/the workgroup since April of this year. When work was re-started on this action, the need to keep this action as a tier 3 in order to keep on schedule was discussed. However, OAR agreed to provide the workgroup information and input, including review of the draft proposal prior to moving to OMB. The kick-off meeting was on 4/12/18 and subsequent meetings were on 5/10/18 and 6/14/18. Our next meeting is scheduled for 08/09/18. In addition to the monthly meetings with the ADP WG, we have had multiple focused meetings between OAQPS, OGC, and OECA. (Our meetings have included from OECA- Sara Ayres and Theresa Dykes. Sara has been working with us on the compliance aspects of our proposal while Terri has been working with us on the enforcement aspects.)

If there are questions or concerns, please email to me. Thank you!

Wanda

Workgroup Members (please provide any updates): Sara Ayres, Teresa Dykes, OECA Scott Jordan, OGC Barry Elman, OP Susan Lancey, R01 Lee Page, Yolanda Adams, R04 Ward Burns, R07



From the desk of: Wanda Farrar